

### **Remarks**

The independent claims were amended to add the clarification that the cake is maintained in a form of a cake between the filter and dryer. Support for this amendment can be found on page 19, lines 1-17 of the disclosure.

### **Status of Claims**

Claims 1- 22 are pending in the application. Each of these claims is under consideration.

### **Claim Rejections – 35 U.S.C. § 103**

Claims 1-22 were rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,013, 835 to Lee et al. (Lee).

Lee does not teach all the limitations of applicants' invention. The limitations that are not taught by Lee are as follows.

For example, if one looks at Lee's process after the filter step with wash, Lee has at least 12 addition steps before drying the final product. For example they have a 1 slurry tank, 1 dissolver tank, batch crude crystallizer, another filter followed by more dissolvers crystallizer, and a wash column and a soaker tank, etc. So in Lee's process the cake is re-dissolved, back into a slurry and then back to a cake, etc. In other words, the many steps in Lee's process changes the form of the cake to a slurry and back to a cake before drying. In applicant's process the cake is sent to the drying without changing form and in much few steps. The amendment to the claim clarifiers that is the process that is occurring.

Therefore, all the elements in the amended independent claims are not taught in the cited art. Therefore, all the elements have not be taught in the dependant claims as well. In addition, there is no reason to modify or combine Lee because it specifically teaches all those steps have to be in place between the filter and dryer.

In light of these arguments, there is no *prima facie* case of obviousness, and applicants respectfully state that the rejections under 35 U.S.C. § 103(a) should be withdrawn.

### Conclusion

The application is in condition for allowance. The Examiner is respectfully requested to reconsider the rejection(s), remove all rejections, and pass the application to issuance.

Respectfully submitted,

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